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Mr. James A. Saric
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USEPA Region 5
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ENVIRONMENT

Subject:

Agreement to Not Implement Specific Phased Sampling Tasks in Area 1 SRI/FS
Work Plan Based on Results from Preceding Tasks

Dear Jim:

Date:

August 17, 2009

Contact:

Michael Erickson, P.E.

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Our ref:

B0064539.00500

- *Hot spot assessment in the Plainwell No. 2 Dam to the Mill Race Confluence segment.* Existing data from prior phases of work do not support conducting a hot spot assessment in this segment. A hot spot assessment will be carried out focusing on the segment between the former Georgia-Pacific Kalamazoo Mill and the Crown Vantage Landfill.
- *Hot spot assessment in Portage Creek.* Existing data are adequate for purposes of developing an alternatives analysis in the Feasibility Study Report.
- *Analysis of up to 20 additional archived cores from the 16 new transects established in the Area 1 SRI/FS Work Plan.* This work was to be carried out, if warranted, based on initial polychlorinated biphenyl (PCB) concentrations in the core samples collected from each of these transects. All core samples classified as fine sediments have already been analyzed. Coarse sediment PCB concentrations in the samples from the new transects were relatively low, averaging 0.30 milligrams per kilogram (mg/kg) and ranging from non-detect to 5.8 mg/kg. Analysis of the additional archived coarse sediment core samples is not warranted based on these results.

- *Additional post-removal sediment sampling in the former Plainwell Impoundment Time-Critical Removal Action (TCRA) area.* Post-removal samples in the former Plainwell Impoundment were collected at 75 locations in the project area. The average and median PCB concentrations in these samples were 1.7 mg/kg and 1.1 mg/kg, respectively. Mid-channel sediments outside of the established removal areas are in a dynamic state as the river is continuing to respond to the removal/bypassing of the former Plainwell Dam. Residual exposures can be represented for purposes of the SRI/FS using the post-removal samples together with samples collected outside removal areas.

This letter is written and submitted to document these agreements. KRSG requests confirmation of USEPA's agreement with the understandings listed above. USEPA's agreement can facilitate KRSG's completion of the remaining sediment sampling in Area 1 during the 2009 field season.

Please do not hesitate to contact me with any questions.

Sincerely,

ARCADIS



Michael J. Erickson, P.E.
Associate Vice President

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